

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Doretha Ward Enterprises,)	Chapter 11
LLC)	
)	
)	NO. 24-16345
Debtor)	
)	
)	Judge : Jacqueline P. Cox
)	

MOTION TO IMPOSE THE AUTOMATIC STAY UNDER 11 U.S.C. § 362(c)(4)

Debtor(s), Doretha Ward, by and through undersigned counsel Timothy Tyler, respectfully request(s) that this Court extend the automatic stay pursuant to 11 U.S.C. § 362(c)(4), and in support state(s) as follows:

1. Debtor filed this Chapter 11 bankruptcy petition on October 31, 2024.
2. **On May 6, 2024**, Debtor filed a personal, “PRO SE” Bankruptcy Chapter 13 Case No. 24-06730 “Prior Case”, in the United States Bankruptcy Court, Northern District of Illinois Eastern District, Division, under Chapter 13. The Prior Case was subsequently dismissed on June 13, 2024 see doc # 24,

IT IS ORDERED that the motion is granted and this case is dismissed pursuant to 11 U.S.C. § 1307 (c)(3), for failure to file a plan timely.

3. **On September 9, 2024**, Debtor filed another Bankruptcy Case No. 24-13243 “Prior Case”, in the United States Bankruptcy Court, Northern District of Illinois Eastern District,

Division, under Chapter 13. The Prior Case was subsequently dismissed on October 7, 2024, see doc # 18,

IT IS ORDERED that the motion is granted and this case is dismissed pursuant to 11 U.S.C. § 1307 (c)(3), for failure to file a plan timely.

4. The below has been the obstacles with the prior two Bankruptcy case.

a. Debtor has thirteen (13) Real-estate properties both commercial and residential that needed to be protected by a Bankruptcy.

b. After extensive accounting it was discovered that , Debtors debt limit disqualified her from filing a Chapter 13.

c. Extensive amount of time was needed to investigate the actual Foreclosure status

of all thirteen (13) properties, such as accurate past due balances for each property and properties already sold with a confirmation order.

5. Debtor did not have any prior cases dismissed in the past year for any of the following reasons:

a. failure to file or amend other required documents without substantial excuse;

b. failure to provide adequate protection as ordered by the Court; or

c. failure to perform the terms of a plan confirmed by the Court.

6. There has been a substantial change in the Debtor(s) financial circumstances since the dismissal of the Prior Case. Debtor has restructured her finances and now was able to afford an Attorney. Debtor was able to Pay her attorney a down payment for legal service/s and pay the filing fee in full for the filing of this current case.

WHEREFORE, the Debtor(s) request(s) this Court grant this Motion to Impose the Automatic Stay as to all creditors, after notice and opportunity to be heard, and for all other proper relief.

/S/ Timothy R. Tyler

Date: 11/06/24

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PROOF OF SERVICE

A true and correct copy of the foregoing has been sent by either electronic transmission or U.S. Mail on September 11, 2024, to: U.S department of Justice Office of the Unites States Trustee Debtors; and all creditors and interested parties as listed on attached service list and matrix.

/S/ Timothy R. Tyler

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